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May 20, 2020

VIA ECF

Honorable Paul A. Engelmayer, U.S.D.J.
 United States District Judge
 Thurgood Marshall
 United States Courthouse
 40 Foley Square, Courtroom 1305
 New York, New York 10007

RE: *Paroni, Elodie & Est. of Eugene v. Alstom SA, et al.*
Civil Action Number: 1:19-cv-01034-PAE

Dear Judge Engelmayer:

As you know, we represent defendant Alstom SA in the above-referenced matter. Pursuant to Rule 1.E of your Individual Rules and Practices in Civil Cases, we write to request an extension of the deadlines outlined in the Court's Order, dated March 3, 2020 (Doc. No. 37), which were subsequently extended by the Court on April 7, 2020, granting plaintiff's request for an adjournment (Doc. No. 39). In light of the fact that the COVID-19 shutdown has lasted longer than most of us has expected, and given that my client, Alstom SA, is based in France, and France was shutdown on March 14, 2020 and only recently allowed certain businesses to re-open on May 11, 2020, we ask that the Court grant our request to extend the deadlines as follows:

	Original Dates per Court Order (Doc. No. 37)	Current Dates per Plaintiff's Request (Doc. No. 39)	Proposed New Dates
Complete jurisdictional discovery	May 4, 2020	June 3, 2020	July 10, 2020
Plaintiff to advise court if continuing action in the SDNY	May 11, 2020	June 10, 2020	July 17, 2020
Alstom SA to file its motion to dismiss for lack of personal jurisdiction	May 25, 2020	June 24, 2020	July 31, 2020

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Plaintiff's Opposition	June 8, 2020	July 8, 2020	August 14, 2020
Alstom SA Reply	June 15, 2020	July 15, 2020	August 21, 2020

By way of background, Plaintiff's counsel served written discovery on Alstom SA on April 3, 2020, during the COVID-19 shutdown period in both New York and France. Alstom SA's responses are due tomorrow on May 21, 2020, after plaintiff's counsel graciously gave us a seven-day extension, and then a ten-day extension to respond. Unfortunately, since plaintiff's counsel served the discovery requests on April 3, 2020, we have not been able to reach our Alstom SA contact in Paris. We have reached out through other channels to locate an alternate Alstom SA contact, but admittedly, we have not been able to communicate with our Alstom SA's contact, or their replacement. Alstom SA will **also** need an extension to serve its responses to **written discovery to June 10, 2020**. Putting aside the extension to respond to discovery given to us by plaintiff's counsel, this is Alstom SA's first request for an extension of time to the Court.

I have reached out to plaintiff's counsel who consents to the proposed dates.

Accordingly, we ask that the Court extend the deadlines as follows:

1. Alstom SA to respond to jurisdictional discovery by June 10, 2020;
2. Complete jurisdictional discovery by July 10, 2020;
3. Plaintiff to advise court if continuing action in the SDNY by July 17, 2020;
4. Alstom to file its motion to dismiss for lack of personal jurisdiction by July 31, 2020;
5. Plaintiff's opposition by August 14, 2020;
6. Alstom's reply by August 21, 2020.

We appreciate the Court's time and consideration in this matter, and are available at the Court's convenience if the Court requires additional information.

Respectfully,

TANENBAUM KEALE LLP

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CC: Plaintiff's Counsel (via ECF)